



United Nations Global Compact

Communication on Engagement

December 2023

Creative Associates International

This report outlines Creative Associates International's activities in support of the United Nations Global Compact between the periods of December 2021 to December 2023.



PART I: STATEMENT OF CONTINUED SUPPORT BY CHIEF EXECUTIVE OFFICER

December 8, 2023

To our stakeholders:

I am pleased to confirm that Creative Associates International (Creative) reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labor, Environment and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact. We welcome feedback on its contents.

In 2023, Creative was awarded two new projects by the United States Agency for International Development (USAID): the Uzbekistan All Children Succeeding program and the West Bank/Gaza Basic Education Activity. Our new program in Uzbekistan focuses on inclusive education and offers Creative the opportunity to influence education policymakers in Uzbekistan to expand and improve access so that all children have the chance to learn. The West Bank/Gaza Basic Education Activity continues to move forward despite the current conflict, and Creative will be partnering with private education providers to bring access and safe spaces to children starting in early childhood education.

In this Communication on Engagement, we describe the actions that our organization has taken to support the UN Global Compact and its Principles. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,

Leland Kruvant
President and CEO



PART II: DESCRIPTION OF ACTIVITIES

Creative Associates International (Creative) provides on-the-ground development services both in conflict and non-conflict situations in the fields of education, economic growth, workforce development, positive youth development, citizen security, governance, and more. As a member of the UN Global Compact, Creative cherishes the ideals of “partnership in development.” Over the past 47 years, Creative has worked to forge lasting partnerships with corporations and local organizations in more than 85 countries around the world in the spirit of equality and reciprocity, and based on shared values, goals, and vision. Creative is committed to upholding the Ten Principles of the UN Global Compact through our programs, strategic partnerships, and internal systems. Below is a description of our activities as they relate to the areas of human rights, labor, environment, and anti-corruption.

Human Rights

Core to our Corporate values and development efforts that we undertake across the many communities we partner with and serve is “respect for human rights,” i.e., promotion of the right of individuals irrespective of skin color, religion, disability, ethnicity or race, gender, sexual orientation, etc. to live in dignity by responding to their fundamental economic needs, and social and political rights. This is explicitly enshrined in Creative’s mission statement; “to support people around the world to realize the positive change they seek.” Since 1977, Creative has worked in fragile and conflict-affected areas and has seen first-hand the detrimental impacts on individuals and communities when human rights are not upheld. Creative’s programs and policies reflect bedrock human rights principles, several of which are particularly relevant to the Compact.

The Compact’s “Children’s Rights and Business Principles” calls on members to meet their responsibility to respect and support children’s rights, including the right to education. Since its founding, Creative has been a leader in expanding quality basic education to children and youth around the world, often in conflict or post-conflict countries. The positive impact of these programs depends on strong partnerships that Creative has forged with local and international partners, many of whom are UN Global compact members, including the International Rescue Committee, Viamo, and World Vision International.

In 2023, Creative rolled out a Gender Equity and Social Inclusion (GESI) and Safeguarding 101 e-learning course to all employees, both in HQ and around the world. This mandatory training covers key inclusion and safeguarding topics and reminds employees of some of Creative’s policies, including:

- **Creative’s Child Safeguarding Protection Policy.** Children living in countries where Creative operates often face a range of challenges, including extreme poverty, conflict, natural disasters, and disease. These challenges can increase the risk of child abuse, sexual or other types of exploitation, neglect, or even trafficking. The purpose of this policy is to ensure that Creative programs are safe for children by promoting awareness of their vulnerabilities and mitigating the risk of, or actual harm that may come to them. In addition, it is also to establish



organizational guidelines, procedures and practices to ensure that children and youth directly involved in Creative’s programs or activities are not subject to child abuse, exploitation, neglect, or human trafficking, or that their personal security and human rights are not otherwise compromised.

- **Creative’s Safeguarding of Women and Other Vulnerable Adults Policy:** In countries where Creative operates, women and other vulnerable adults, such as LGBT, the disabled, ethnic minorities, the rural poor, indigenous groups and others, often face a range of challenges, including extreme poverty, conflict, natural disasters, and disease. Moreover, women and other vulnerable adults are often subjugated, oppressed, discriminated, treated inequitably, or disrespected. These conditions, particularly those relating to mistreatment and inequality, can increase the risk of sexual abuse, exploitation, harassment, violence, or trafficking. The risks are heightened in humanitarian or fragile and conflict-affected contexts, where power imbalances can be particularly acute and the displaced have little recourse. The purpose of this policy is to establish organizational guidelines to ensure that women and other vulnerable adults directly involved in Creative’s programs or activities are not subject to misconduct perpetrated by Creative employees, consultants or partners, and that Creative mitigates the risk of harm to them as beneficiaries of Creative’s programs.
- Creative’s **Code of Ethics and Business Conduct** broadly reflects well-established human rights and ethical principles. For example, Creative’s Code of Conduct values diversity and inclusion; works to prevent harassment and discrimination of any form; promotes a safe and healthy workplace; and protects personal information.

Labor

Creative is committed to corporate-wide diversity – inclusive of gender, age, race, ethnicity, orientation, ability, nationality, religion, veteran status, background, culture, experience, strengths and perspectives, and inclusive culture –where our employees feel welcomed, valued, respected, accepted and heard, and are enabled to fully participate in the business.

Creative has established a robust set of policies to prevent unfair or discriminatory employment practices. These include policies for equal employment opportunities, anti-discrimination, worker health and welfare provisions, ethical work behavior, conflict of interest, anti-harassment, ensuring a non-hostile workplace, and others. Creative also uses tools and methods, such as localized gender assessments and audits, to better understand the needs of male and female staff in each context, ensure meaningful participation and representation of women in program staffing, and identify strategies to address barriers and norms that may negatively affect staff from minority groups. Creative has established several policies to ensure child protection and safety in its global programs. Under its **Anti-Trafficking Policy**, Creative strictly prohibits a range of actions associated with human trafficking during program implementation, including severe forms of trafficking in persons; procuring commercial sex acts, and using forced labor in the performance of the contract. Creative also seeks to prevent trafficking through training programs, raising awareness, and promoting a culture of anti-



trafficking among those hired or retained by Creative. In addition, if Creative personnel receive information that trafficking has been or may be occurring, it conducts a thorough investigation, determines the appropriate action to address any instances of inappropriate behavior, up to and including termination of employment, and may withhold payments and/or terminate sub awards, grants, or procurements that are non-compliant with anti-trafficking regulations.

Creative's economic growth programs honor the right to economic empowerment, embedded in the International Covenant on Economic, Social and Cultural Rights. Creative supports the active participation of women and minority groups and the protection of children.

A Creative workforce development project in Asia supports ethnic minority groups and highly prioritizes women in senior leadership of the project, such that seven of the eleven staff are women. The project works through value chains to increase livelihood opportunities and educate beneficiaries about health issues such as nutrition and diet, and about the need for better natural resource management (NRM). The project provides entrepreneurship and workforce training to boost income and establish new livelihoods. These livelihood activities will improve health literacy, increase income opportunities, and improve sustainability of natural resources.

Environment

The UN Global Compact challenges businesses to undertake initiatives to promote greater environmental responsibility and consciousness. Creative recognizes the importance of designing sustainable development programs for implementation, but also the importance of raising environmental awareness and practicing environmental consciousness in its day-to-day operations.

In 2023, Creative completed its first Greenhouse Gas Measurement. Completed with the guidance of an external consulting firm, we disclosed our FY22 numbers publicly on our website: <https://www.creativeassociatesinternational.com/greenhouse-gas-disclosure/>. We are starting the conversation around setting and achieving science-based reduction targets that will have a positive impact on our need to reduce the causes of climate change.

Creative strives to minimize any negative impact on the environment from its activities and operations and promotes environmental awareness throughout our supply chains. These efforts extend to measures taken on specific projects that involve activities such as construction and certain agricultural interventions, as well as everyday measures that can be implemented in each office. These include actions such as minimizing paper and fossil fuel use, increasing energy efficiency and conservation, encouraging recycling, and making smart use of project vehicles to reduce our emissions and carbon footprint. Creative recognizes the importance of designing sustainable development programs for implementation, as well as the importance of practicing environmental consciousness in its day-to-day operations.

Creative strives to contribute to sustainability efforts by employing green practices in our daily operations. Creative's headquarters is in a LEED Gold building with energy conservation mechanisms, such as automatic light and HVAC shutdowns at the end of the workday and weekends. Toner cartridges



are recycled, paper shredding is conducted through vetted safe-shredding certified vendors, and technological waste is disposed responsibly. Creative has also opted to use bean-to-cup coffee machines instead of coffee pods to significantly reduce plastic consumption. In 2023, Creative switched to compostable coffee cups and began stocking our supply rooms with recycled paper. Creative complies with the United States 1995 Paperwork Reduction Act, and reduces environmental waste by recycling paper, glass, and aluminium. In 2024, Creative’s headquarters building plans to start composting and Creative will participate.

Creative implements select USAID programs that require contractors to promote sound and sustainable environmental practices throughout the program’s core activities. During start-up, Creative reviews program activities in the context of the Initial Environmental Examination (IEE) prepared for the activity. When a country-level IEE does not exist, Creative supports USAID in developing a supplemental IEE to the project’s specific activities and context. Based on the threshold determinations and conditions of the IEE for each relevant project, Creative submits an Environmental Mitigation and Monitoring Plan (EMMP) as part of the initial work plan that guides implementation. Creative’s management approach for such projects outlines the effective use of institutional arrangements such as sub-awards and sub-grants to achieve project results.

Creative includes environmental compliance language in all sub-grants and sub-awards, and ensures subcontractors and grantees integrate appropriate environmental compliance requirements, such as integrating country IEE conditions into program work plans, ensuring allocation of appropriate resources, and regularly screening and reporting on appropriate elements of environmental compliance. Creative regularly trains grantees and/or subcontractors to increase their capacity to implement the relevant requirements of the country IEE. Creative also budgets appropriate resources to implement environmental compliance and mitigation activities, including project environmental management expertise and mitigation measures.

Anti-Corruption

Creative as a company has a demonstrated track record of taking steps to ensure that it is vigilant against corruption, misconduct, and conflicts of interest. Creative has implemented a new broad anti-corruption policy applicable to all Creative personnel worldwide. It is also Creative’s policy to comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”) and the local laws in every country in which we do business. The FCPA mandates that companies establish and maintain accurate books and records and sufficient internal controls. The FCPA applies to all employees of Creative, including officers and directors. In addition, Creative will require third parties who represent the company (such as agents, consultants, and contractors) to conduct themselves in a manner consistent with this policy.

Creative conducts formal and informal vetting for all employees and partners to ensure that no client funds go to blacklisted individuals, compliance with client-mandated rules and regulations, and an appropriate understanding of performance and reputation. Creative uses the Visual Compliance Database system to check more than 50 watch lists, including the HM Treasury Consolidated List, United



Nations Consolidated List, and Interpol Recently Wanted. Creative's Security Department develops project-specific Vetting Plans adapted to each program's requirements.

In addition, all staff are briefed on, and required to sign, Creative's **Code of Ethics and Business Conduct** and conflict of interest policies. Creative has also developed specific training on the Code that employees take on an annual basis. If project staff are found to be engaged in corrupt activities, we remove those individuals from the project in a careful and culturally sensitive way. In all cases, we inform the client immediately if an allegation has been raised or suspicions arise, and work with the client to resolve the issue for the integrity of the program. Creative requires employees to disclose any suspected or actual cases of conflict of interest in which they may be involved or witness.

Creative also has a **Whistleblower Policy** that informs Creative's employees of their statutory whistleblower rights and protections. The policy states that it is contrary to the values of Creative for any employee to retaliate against anyone who reports an allegation or violation in good faith, reports an ethics violation or a suspected violation of law, fraud/waste/abuse, or violation of any regulation governing the operations of Creative. An employee who retaliates against someone who has reported an allegation or violation in good faith is subject to discipline, up to and including termination of employment.

Pursuant to Creative's Reporting of Fraud, Allegations of Fraud and Misconduct Policy, Creative's Security Office is responsible for the receipt, review, investigation and resolution of all allegations of fraud and misconduct. Any allegation regarding a Creative employee or other relevant party involving violations of law, government regulations, or Creative standards of conduct must immediately be reported to the Team Lead via the program specific hotline or to Creative's Security Office Fraud and Abuse direct lines, via email, or online.

PART III: MEASUREMENT OF OUTCOMES

Creative is a results-oriented organization that uses evidence-based programming to promote the UN Global Compact's mission and principles. Below are examples of Creative-led programs that have achieved positive results in the areas of human rights, education, labor, and anti-corruption.

- **Somalia Bar ama Baro (BAB):** The BAB program is a five-year primary education program designed to support the Government of Somalia in the design and delivery of comprehensive, inclusive non-formal education services. The program is focused on improving access and quality of education for school children through direct implementation of an Accelerated Basic Education (ABE) program in thirty-one districts of the country. Through a combination of program design and delivery, policy support, and system change, BAB works with the Somali government and its stakeholders to improve curriculum, increase capacity, extend service reach, and strengthen learning support, ensuring that children, regardless of marginalization, will be able to access equitable, safe, conflict-sensitive education.



- **READ II:** The USAID-funded READ II Education Recovery Activity was originally designed as an Early Grade Reading (EGR) program to improve the reading proficiency of 15 million children in seven regions of Ethiopia - Addis Ababa, Amhara, Oromia, Somali, Sidama, SNNP, and Tigray – in seven mother tongues and English. In the first three years, READ II supported more than 70 woredas and 3,000 schools across the country. Due to the COVID-19 pandemic, READ II pivoted from in-person interventions to employ virtual technology response, including distance learning via radio and TV broadcasts, virtual trainings for teachers, and establishing an IVR hotline to engage teachers, parents, and school directors. Despite READ II’s rapid response, the pandemic created a learning crisis that severely affected the Government of Ethiopia’s significant strides in improving access to school and learning over the past two decades. This crisis was further exacerbated by the outbreak of the Northern Ethiopia Conflict in November 2020. While navigating the challenges brought on by COVID-19 and the Northern Ethiopia Conflict, READ II pivoted six times by shifting from EGR to Education in Crisis and Conflict (EiCC) and descoping from the seven target regions to only focusing interventions in Amhara, Afar, and Tigray. In response to the critical emergency needs from the Northern Ethiopia Conflict, READ II Education Recovery Activity was repurposed as an Education in Crisis and Conflict (EiCC) Activity, along with its partner World Vision International, to provide Education in Emergency response to affected regions and communities.
- **West Africa Trade and Investment Hub (WATIH):** The United States Agency for International Development (USAID)-funded West Africa Trade and Investment Hub (Trade Hub or Activity) is a 5-year, \$140.2 million trade and investment facilitation activity that seeks to improve private sector productivity, profitability, and competitiveness in West Africa through market-based approaches. The Trade Hub is an integral part of the Prosper Africa initiative and partners with United States and West African private sector firms to generate new private sector investment in key sectors to create jobs and increase trade between the United States and West Africa, including through increased utilization of the African Growth and Opportunity Act (AGOA). This activity comprises two main components: (1) design and administration of a grant-making facility for private sector partnerships; and (2) technical assistance (TA) that directly supports, coordinates, and engages with qualifying recipients (i.e., partners and grantees) to achieve USAID’s trade and food security objectives.

In Nigeria, the Trade Hub also focuses on co-investment partnerships that increase agricultural productivity and the profitability of smallholder farmers in Nigeria under a Research and Development (R&D) Fund aimed at innovating and modernizing practices across five targeted value chains. The Trade Hub’s grant making facility has also assisted small and medium enterprises to overcome disruptions in export-oriented supply chains, support domestic food security initiatives, and prevent job losses through grant assistance to maintain or scale-up their production and service capabilities. The Trade Hub considered potential co-investment partnerships with over 200 firms and executed grant agreements with 39 of these firms. An additional 90 firms are actively engaged in various stages.



- **Central America Regional Initiative (CARI):** The United States Agency for International Development Office of Transition Initiatives (USAID/OTI) launched the Central America Regional Initiative (CARI) program in May 2021. Creative implements CARI on behalf of USAID and is in its third year of programming. The CARI program operates in El Salvador, Guatemala, and Honduras to address the root causes of irregular migration, such as corruption, poverty, gender-based violence (GBV), crime, climate change, and violence. During this reporting period, CARI El Salvador, Guatemala, and Honduras continued to implement activities in support of program objectives. Corruption, transparency, citizen security, and GBV continue to be major issues in the region. In Guatemala, a turbulent election period continues to present both challenges and hope for democratic norms strengthening under the new administration. El Salvador’s State of Exception (SoE) is presenting significant challenges to respect for human rights and due process. The Government of Honduras (GoH) is also experiencing increased challenges to citizen security and failure to effectively respond to GBV against women, making the reported gains under their SoE questionable. Through these simultaneous challenges and windows of opportunity, CARI continues to support cohesion at the community level and create opportunities for dialogue and action.

Creative Associates International
Chevy Chase, Maryland
December 2023